March 31, 2016 Dico Site Visit

Participants:

EPA: Erin McCoy and Mary Peterson
Dico/Dico Contractors: Gazi George and Brian Mills
City of Des Moines: Rita Conner

Arrived at the site at approximately 10:45 am. Overcast day, approximately 40-50 degrees with a strong wind. The City and Dico Contractor representatives were already on site. The buildings are completely enclosed in a lockable chain link fence. Started walking through the buildings, beginning with Building 2 and going on to Building 3. Graffiti is abundant in both buildings.

In Building 2, a lot of the paint was chipping off of the walls (as seen with the pictures below). Ceiling sealing material was also falling. Windows were broken, though several of them were covered with wood from the outside.

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We discussed the type of samples that would be needed for the ROD amendment prior to building demolition. Samples identified for the site included:

- Wipe samples of building framework (i.e. steel, etc.) to identify surface contamination which would indicate what would need to be cleaned prior to disposal (PCBs and pesticides).
- Insulation samples to determine if all of the insulation is contaminated or just portions (i.e. adhesive section, silver material) (PCBs and pesticides).
- Concrete core samples to determine if the contamination has migrated into the concrete foundations, and if so, how far into the foundation (PCBs and pesticides).
- Subslab soil samples to determine if contamination is present under the building foundations (PCBs, VOCs and pesticides).

The production building was open (doors open and windows broken) and we toured a small portion of it. This building has not been tested for chemicals of concern and we discussed the need to take additional samples in this building to verify that chemicals of concern were not present. While in the production building, we discussed previous samples. In the past, Gazi and Mary remembered that a majority of the PCB contamination was located in the adhesive, silver material attached to the insulation. We discussed options of potentially separating this material from the insulation and sampling the insulation to see if all of it needed to go to a special landfill. However, Gazi did mention that it is sometimes hard to separate the material because it is so old and brittle.

We also discussed asbestos. Gazi said that all of the buildings would need to be tested for that before disposal.

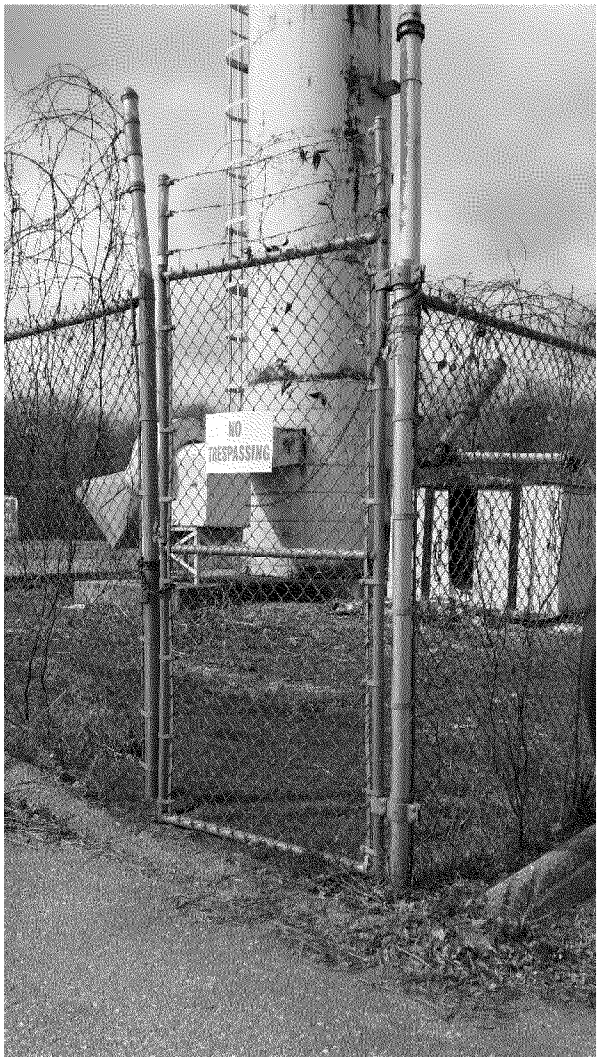
While in the production building, approximately 8 to 10 55-gallon drums were found in the SE corner. The drums were either plastic or steel. One steel drum was severely bulging. We did not get close enough to see if it was marked. Gazi said he was not sure what was in them or where they came from and that he would collect a sample to make sure that they were properly disposed of. The bulging drum is located to the left of the red I-beam and Brian Mills in the photograph to the left. The drum is upside-down. There was no evidence of a recent leak (i.e. staining on concrete, wet concrete, etc.) in the area.

After the production building, we continued toward the remaining foundation of Buildings 4 and 5. There are currently 2 small above ground tanks on site that Gazi indicated were old, empty diesel fuel tanks.

The foundation of Buildings 4 and 5 extends above the ground surface approximately 1 to 3 feet depending on the location. It is unknown if it is a solid structure or if it is a concrete frame with a concrete floor top. This could pose difficulties with concrete coring if the foundation is solid.

The concrete was relatively intact with minimal vegetation growth in previously patched seams.

The treatment area was fenced, though Brian mentioned that at one time a homeless man was living in the attached shed. The area is completely surrounded by a chain link fence with barbed wire on top.



We discussed a few options with the City and mentioned that it would probably be cheaper and easier to utilize the area, especially areas with known contamination, as parking since a parking lot would not require footings (i.e. limited exposure to contaminated soil) and would be easily maintained while keeping part of the remedy in place. Gazi said that the building foundations were solid and had not settled over the years, indicating that the City could build on top of the current foundations. I told Rita that I wasn't sure if that could be possible since most construction required footings to extend below the frost line to prevent heaving due to freeze thaw and the information for the foundation was

unknown at this time. She asked if EPA would be able to help her identify which foundations they could build on. I told her no, that I was not a structural engineer. However, we could help her identify areas where it would be better to have parking opposed to structures that would require footings and digging in contaminated soil, based on potential exposure to contamination. She said that they were planning to use existing city lots (off Dico property) for parking that were currently being underutilized. I mentioned that she may still need to account for handicap parking or unloading zones, and that we could help her with that since the actual design had not been decided yet. However, I did let her know that a structural engineer would likely be needed to determine if the current foundations could be use or if new footings would be needed, and that EPA could not provide that service.

The South Pond Area (SPA) is located outside of the fence. There is a lot of trash around the area. No trespassing signs are displayed approximately every 50 feet. A security guard was on site, picking up trash. The SPA is much larger than it appears on the map.

EPA brought up the Ecological Risk Assessment. Gazi said he had not had the opportunity to read it yet. Mary stated that the recent sediment sampling indicated an ecological risk and that additional data is needed to determine whether there is a human health risk as well. The additional data will be collected during the site characterization work needed to support amendment of the OU2/4 ROD. Mary asked Rita how the city envisions the South Pond area fitting into their development plan. Rita indicated that the city envisions maintaining the pond area in a natural state with pedestrian trails around the pond and through the woods to connect to Gray's Lake Park. Mary stated that additional work will be needed in and around the pond to address contamination in order to make it suitable for a recreational use scenario. Mary indicated that the OU2/4 ROD amendment will determine what the work will entail. Gazi stated his opinion that surface water drainage from the areas around the Dico buildings does not drain to the South Pond. Mary disagreed with Gazi's assessment of the surface runoff indicating that the South Pond has historically been the drainage point for site runoff. Surface runoff will be examined during the site characterization work. In addition, Gazi mentioned that Dico is not responsible for the South Pond area since the previous cleanup work was all conducted by the Dichem Customer Group. Mary reminded him that Dico still owns the property and retains liability for the South Pond area.

Gazi mentioned that he was planning on having the demolition team give him a quote on what it would cost to demolish the buildings. EPA told him that that would vary greatly depending on the level of contamination. Mary also mentioned that things would move along a lot faster if EPA handled the characterization since we already had the contractors in place and could move quickly, especially since Dico would not have to submit a work plan outlining the sampling or go through revisions. He agreed to all of that, as well as the contaminations impact to disposal cost. Gazi indicated that the Titan board needed to know what the overall costs were before they would probably commit either way to the DOJ offer.

Left the site at approximately noon.